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June 17, 2019

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
 Chief Clerk/Administrator
Public Service Commission of South Carolina
 101 Executive Center Drive
 Columbia, South Carolina 29211

**Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding
 Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource
 Plans for Dominion Energy South Carolina, Inc.;
 Docket No. 2019-226-E**

Dear Ms. Boyd:

On behalf of Dominion Energy South Carolina, Inc. ("DESC"), I am writing in response to your letter dated June 13, 2019, requiring electrical utilities, the South Carolina Office of Regulatory Staff, and other interested parties to file proposed procedural schedules related to implementation of S.C. Code Ann. § 58-37-40 and each electrical utility's Integrated Resource Plan ("IRP").

As reflected in Docket No. 2019-9-E, DESC filed its current IRP on February 8, 2019. Given the recent nature of this IRP and because S.C. Code Ann. § 58-37-40 requires electrical utilities to submit a comprehensive IRP once every three years, DESC submits that it is not presently required to further update its IRP to comply with the requirements of 2019 Act No. 62. Instead, DESC intends to follow its historical practice to update its IRP in February of each year, and proposes to file an updated IRP in compliance with the requirements of the newly enacted S.C. Code Ann. § 58-37-40(A) on February 28, 2020.

In addition, DESC understands that certain interested parties have suggested the Commission initiate a generic proceeding for the purpose of establishing guidelines to be used by the electric utilities in preparing and filing their IRPs prior to Commission review. Contrary to these suggestions, however, 2019 Act No. 62 already establishes detailed and specific guidelines regarding IRPs to be filed by electrical utilities. See S.C. Code Ann. § 58-37-40(B)(1). The Act also sets forth a comprehensive procedure by which the Commission, ORS, and other interested

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parties can review the proposed IRP and assess whether the electrical utility has complied with the extensive statutory criteria put in place by the South Carolina General Assembly. ***See S.C. Code Ann. § 58-37-40(C).*** DESC submits that **these requirements and procedures provide ample guidance to determine the sufficiency of IRPs filed by electrical utilities and that, therefore, establishing a separate proceeding to establish further guidelines is neither required nor warranted by 2019 Act No. 62.**

Thank you for your consideration of this matter. If you have any questions or need anything further, please do not hesitate to contact me.

Very truly yours,



K. Chad Burgess

KCB/kms

cc: Becky Dover, Esquire
Carri Grube-Lybarker, Esquire
Jeffrey M. Nelson, Esquire
Richard L. Whitt, Esquire
(all via electronic mail and U.S. First Class Mail)